



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

January 21, 2020

BY ELECTRONIC MAIL

Robert Law, Ph.D.
de maximis, inc.
186 Center Street, Suite 290
Clinton, New Jersey 08809

Re: Re: Draft Upper 9-Mile Source Control Interim Remedy Feasibility Study (FS) –
Administrative Settlement Agreement and Order on Consent for Remedial
Investigation/Feasibility Study (Agreement) CERCLA Docket No. 02-2007-2009

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) has reviewed the *Lower Passaic River Interim Remedy Feasibility Study (FS) Proposed Model Metrics for the Revised IR FS Report*, dated December 16, 2019, prepared by Integral Consulting, Inc. on behalf of the Cooperating Parties Group (CPG) for the Lower Passaic River Study Area (LPRSA) Remedial Investigation (RI)/FS. Comments on the proposed *Model Metrics* include items needing clarification and requests for changes and/or additions. In accordance with Section X, Paragraph 44(d) of the Agreement, EPA has enclosed an evaluation of CPG's *Model Metrics* with this letter.

Please proceed incorporating these revisions into the next version of the *Draft FS* consistent with the enclosed comment evaluations. Clarifications may be discussed in meetings or conference calls as needed. If there are any questions, please contact me to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Salkie".

Diane Salkie, Remedial Project Manager
Lower Passaic River Study Area RI/FS
Enclosure

Cc: Zizila, F. (EPA)
Sivak, M. (EPA)
Hyatt, B. (CPG)
Potter, W. (CPG)

Clarifications

1. The first bullet on page 1 indicates that SWACs for three reaches will be presented, as they were in the draft FS report, however, the first item in Attachment 2 refers to only two reaches. Please revise the text in Attachment 2 to clarify that SWACs will be included for the three reaches (RM 8.3 – RM 15, RM 0 – RM 8.3, and RM 0 - RM15)
2. The text in the first paragraph following the bullets on page 1 regarding water column net fluxes references Figures 8-12, 8-14, 8-17, and 8-19, which present cumulative water column fluxes. The text on page one, however, does not mention annual water column fluxes (Figures 8-11, 8-13, 8-16 and 8-18). Attachment 2 (Cross reference to Table 8-1 items 6, 7, 8, and 9) indicate that both annual average and cumulative water column fluxes of COPCs will be included. Please revise the text on page one to clarify that both annual averages and cumulative fluxes will be included.
3. The proposed metric of RM 8.3 to RM 15 surface sediment recovery rate over the post remedy period is preferred to the year-to-year rate of change in the Draft FS report (Figure 8-6). Two potential approaches are listed in the December 20th memo, and deriving the half-life from a log-linear regression of the end-of-year sediment concentrations is preferred over the alternative of computing it from only the year 8 and year 18 concentrations. Please clarify that in addition to expressing the recovery rates as ranges, they will also be presented for each individual simulation.

Changes/Additions

4. The COPC erosion flux from RM 8.3 to RM 15 is a useful metric. Please replace gross COPC flux with net COPC flux or include net COPC flux in addition to gross flux.
5. In the characterization of uncertainty, it is requested that results from simulations with different dredging release rates be kept separate from simulations from either conditional simulation mapping (Figure 8-20) or scenario-specific sediment transport versus MNR-sediment transport (Figure 8-21). The addition of results from simulations performed with remedy-specific sediment transport for each alternative, and sensitivity to release rates will provide a more-complete characterization of uncertainty but keeping categories of changes separate will aid in understanding the effect of alternate input selections. The effect of the change in dredging loss rates on post-construction concentrations is greatest just after completion of construction and diminishes over time. Including the dredging loss rate sensitivity simulation results with other input variations (e.g. MNR vs remedy specific HST, or map selection) would make it difficult to understand the uncertainty due to individual factors.